

ZEN2/ENVIRONMENTAL PROTECTION AGENCY
REGION VI
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SUBJ: SITREP-POL SIX, POTENTIAL MAJOR RELEASE CONTAMINATED WATER
DISCHARGE, COTTON PATCH BAYOU, HOUSTON SHIP CHANNEL IN THE VICINITY
OF AGRIFOS FERTILIZER INC, MISLE CASE NO. 372856, NRC 847936.

1. SITUATION: (ALL TIMES LOCAL)

A. 10 SEP 07 RELEASE TO COTTON PATCH BAYOU REMAINS SECURED AT THIS
TIME. POTENTIAL STILL EXISTS FOR ADDITIONAL MAJOR RELEASE
DEPENDING ON WX OR INTERRUPTIONS OF PLANT OPERATIONS. MINOR
SEEPAGE STOPPED AND CONTAINMENT WALL REPAIRED. NO OTHER BREACHES
HAVE BEEN DISCOVERED. PH MONITORING SHOWS POSITIVE COUNTERACTION
WITH REGARDS TO SODA ASH INTRODUCTION. AGRIFOS FERTILIZER INC (RP)
INITIATED NRC REPORT #848320 CONCERNING SEEPAGE. NO RAIN TODAY HAS
ALLOWED WATER LEVELS AND FREEBOARD TO REMAIN CONSTANT. RP HAS
PRODUCED A MORE DETAILED WATER BALANCING SHEET, WHICH SHOULD ALLOW
FOR BETTER WATER LEVEL MONITORING AND BETTER DETERMINATION OF
IMPACTS FROM FUTURE RAIN EVENTS. RRT WAS BRIEFED ON PLANNING
EFFORTS ON REDUCING CONTAMINATED WATER LEVELS BY 35 MILLION GALLONS
THROUGH ON-SITE TREATMENT AND/OR OFF-SITE WASTE DISPOSAL. RP MADE
POSITIVE PROGRESS ON AGREEMENT WITH GULF COAST WASTE DISPOSAL
AUTHORITY TO TAKE ONE MILLION GALLONS OF PRE-TREATED WASTE PER DAY.
DETAILS OF PRE-TREATMENT AND TRANSPORTATION REMAIN ISSUES WITH THIS
OPTION. ADDITIONALLY, RP SCIENTISTS ARE INVESTIGATING WHETHER
WASTE WATER FROM FERTILIZER PROCESS CAN BE TREATED AND TURNED INTO
LOW GRADE FERTILIZER COMMODITY. HOWEVER, NONE OF THE OPTIONS
LISTED ABOVE CAN BE IMPLEMENTED IMMEDIATELY OR OFFER A THROUGH PUT
VOLUME WHICH WILL SIGNIFICANTLY REDUCE CONTAMINATED WATER LEVELS IN
A TIMELY MANNER. LIKEWISE CONTINGENCY PLANS FOR IMMEDIATE STORAGE
FACE SIMILAR LOGISTICAL AND THROUGH-PUT CHALLENGES. EXXON-MOBIL
PARTICIPATED IN THE COMMAND STAFF BRIEF AND INDICATED THEY WOULD
PROVIDE TECHNICAL EXPERTISE. HOWEVER, EXXON-MOBIL, WHICH IS
RESPONSIBLE FOR CLOSING UNUSED GYPSUM STACKS, STATED THEY HAD
PREVIOUSLY EXPLORED MANY OF THE SAME DISPOSAL OPTIONS FOR THE
CONTAMINATED WATER, AND FOUND AN INJECTION WELL WAS MOST FEASIBLE.
EXXON-MOBIL'S INJECTION WELL FOR CURRENT CLOSED GYPSUM STACK IS
SCHEDULED TO BE READY FOR OPERATIONS IN OCTOBER. HOWEVER, THE
INJECTION WELL PERMITTING IS STILL IN THE PROCEDURAL PROCESS.
GYPSUM STACK EXPERTS FROM ARDAMAN AND ASSOCIATES AND TERA HELD A
TECHNICAL MEETING TO DISCUSS OPTIONS AND DEVELOP A WRITTEN RISK
ASSESSMENT TO BE USED AS A DECISION TOOL IF CONDITIONS DETERIORATE
FURTHER. DUE TO THE MINIMAL FREE BOARD, THE TECHNICAL EXPERTS
RECOMMENDED CLOSER MONITORING OF GYPSUM STACK STRUCTURES. ONLY NEW
OBJECTIVE FOR NEXT OPERATIONAL PERIOD WAS TO IMPLEMENT DAILY
STRUCTURAL ASSESSMENTS OF GYPSUM STACKS BY QUALIFIED PERSONNEL.

B. O/S WX: WINDS 8 KNOTS SE, SEAS: CALM, VIS: 10NM, TEMP 81F
C. ESTIMATED COST CHARGEABLE TO THE FUND IS AS FOLLOWS:

CONTRACTOR COSTS: \$0,000.00
COAST GUARD COSTS: \$3,905.98
OTHER AGENCIES: \$0,000.00

TOTAL COSTS: \$0,000.00

FUNDS REMAINING: \$21,094.02

ACCT. DATA: 2/H/701/872/80/0/C07152/37170/2523

RESPONSIBLE PARTY: AGRIFOS FERTILIZER INC

D. MEDIA INTEREST: NONE.

2. ACTIONS TAKEN.

A. 9 SEP 0800 OPS BRIEFING CONDUCTED.

B. 0830 COMMAND AND STAFF MEETING.

C. 0900 CG MEETING WITH EXXON-MOBIL

D. 1200 RRT BRIEF.

E. 1500 TECHNICAL EXPERT MEETING

F. 1530 TACTICS MEETING HELD.

H. 1700 PLANNING MEETING HELD.

3. FUTURE PLANS AND RECOMMENDATIONS.

A. 11 SEPT 2007 0800 OPERATIONS MEETING.

B. TREATMENT AND STORAGE WORK GROUPS CONTINUE WORKING ON UC OBJECTIVES TO FIND VIABLE SOLUTION TO MITIGATE EMERGENCY.

4. CASE PENDING.